



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 3/29/99
Time Start _____
Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT



GENERATOR



S Q GENERATOR

Company name Norquay Technology Inc. I.D. Number PA0982363889
Site Address Riverview Industrial Center, Front + Lloyd STs, Chester PA
County Delaware Municipality Chester City ZIP 19016
Name of Inspector Paul Jandel
Name & Title of Responsible Official David Potter, PI.
Person Interviewed JAA Telephone (610) 874-4330
Mailing Address (if different from above) _____
Amount of Hazardous Waste Generated per Month: _____ Pounds > 1000 Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg ☐ Drip Pad Other _____
PBR: ☐ Neutralization/WWTP ☒ Reclaim See comments. Other _____
Generator Treatment ☐ Containers ☐ Tanks ☐ Containment Bldg ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity HandlerUniversal Waste Types not det'd.

3. Hazardous Waste Transporters:

Transporter Name See 11/98 Insp. License Number _____
Transporter Name _____ License Number _____
Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
	<u>See 11/98 Insp.</u>	

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Norquay ID Number PA090263009 Date 3/29/99

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS**1 2 3 4****REQUIREMENT****CHAPTER CIT.****LINE**

				CONTAINERS (Subchapter I)		
			X	Containers managed in compliance with Chapter 265 Subchapter I	262.34	H025
X				Containers of hazardous waste in good condition	265.171	H026
X				Containers and stored waste compatible	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265.173	H028
X				Containers managed to prevent leaks	265.173(b)	H029
			X	Containers labeled to accurately identify contents	265.173(c)	H030
			X	Container storage areas inspected at least weekly	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265.176, 265.177	H032
			X	Proper containment and collection systems in place <i>See work by Dennis</i>	265.178(a)-(d)	H033
			X	All storage requirements for ignitable or reactive wastes and nonignitable or nonreactive wastes met	265.178(e)	H034
			X	Containers clearly marked with accumulation date and visible for inspection	262.34(a)(2)	H035
						H036
						H037
						H038
				TANKS (Subchapter J)		
			X	Tanks labeled "Hazardous Waste"	262.34(a)(4)	H039
				Written certification by registered professional engineer for proper tank (system) design and installation on file	265.192	H040
				Secondary containment provided for tanks (systems) as required	265.193	H041
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265.194	H042
				Tanks labeled to accurately identify contents	265.194(d)	H043
				Required inspections completed and documented in operating log	265.195	H044
				Release reported to Department within 24 hours, unless exempted	265.196	H045
			X	Special requirements for ignitable and reactive wastes followed	265.198	H046
				SQ Generator complies with 265.201	262.34(e)(3)	H047

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name W. 1400 ID Number PA0902363801 Date 3/24/99

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS**1 2 3 4****REQUIREMENT****CHAPTER CIT.****LINE**

				Containment Buildings (Subchapter T)		
				Building completely enclosed to prevent exposure to the elements	265.521(a)(1)	H048
				Meets special requirements if liquids present	265.521(b)	H049
				Primary barrier free of significant gaps, cracks and deterioration	265.521(d)(1)(i)	H050
				Level of hazardous waste within unit is below containment walls	265.521(d)(1)(ii)	H051
				Tracking of waste out of unit by equipment or personnel prevented	265.521(d)(1)(iii)	H052
				No visible dust emissions at doors, windows, vents, etc.	265.521(d)(1)(iv)	H053
				Professional engineer's certification placed in operating record	265.521(d)(2)	H054
				Required inspections performed and logged in operating record	265.521	H055
						H056
						H057
						H058
						H059
				Drip Pads (Subchapter S)		
				Engineer's certification of existing drip pads on file	265.501	H060
				Drip pad meets 265.503 design & operating standards	265.501	H061
				(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265.501(a)	H062
				(b) Has synthetic liner below the pad with properly constructed leak detection system	265.501(b)	H063
				Drip pads & collection system maintained to prevent deterioration	265.503(c)	H064
				Drip pads & collection systems designed to prevent run off	265.503(d)	H065
				Run-on/run-off control system maintained unless pad protected by a structure	265.503(e)	H066
				Release reporting requirements met	265.503(m)	H067
				Drip pads inspected weekly and after storms when in operation	265.504(b)	H068
						H069
						H070
						H071
						H072
						H073



Norquay Technology Incorporated, U.S.A.

P.O. Box 468

Chester, Pennsylvania 19016

(610) 874-4330

(610) 874-3575 FAX

January 4, 1999

Mr. Paul A. Jardel
Pennsylvania Department of Environmental Protection
Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428

RE: Notice of Violation dated November 6, 1998

Dear Mr. Jardel:

In response to your notice of violation, may we offer the following:

- 1) The staff has been re-instructed in the proper siting of waster containers. The warehouse supervisor will inspect the area to insure that the access remains clear.
- 2) The facility emergency response plan will be re-written to comply with § 262.46(e). This will be completed no later than February 19, 1999.

Yours truly,

Shaun Shannon
Clerk

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 3/29/99 ID Number PAD982363889Company/Facility/Site Name Norquay Technology Inc.

This hazardous waste generator follow up inspection of the above facility was done by Department WMS Paul Jadel and EPS James Grabusky along with Mr. David Potter, Norquay Engineer. With the recent departure of Mr. Shannon, Mr. Potter has become the environmental contact for the facility. During this inspection the following was observed:

A draft copy of the facility Emergency Response Plan was viewed. Some information, required from the local authorities, would make the document complete. This condition is a continuing violation of 262.46. Mr. Potter stated that he is currently attempting to contact the Chester Fire Dept.

The main hazardous waste storage area contained app. 42 drums staged on portable containment pallets. As during the last inspection, the pallets formed a rectangular block that did not meet the requirements of 265.178(e)(3).

App. 42 drums were staged outside of the building. Mr. Potter stated that the drums were going to be transported offsite as hazardous waste on that day. Prior to the inspection it was observed that the containers were unlabeled. This is a possible violation of 262.34 ref. 265.173(c).

The facility should be aware that weekly secondary containment inspection records should be kept, in compliance with 265.174.

Mr. Potter stated that the empty drums staged in the outside area located adjacent to the PQ Corp. will be evaluated shortly. All will be rinsed prior to final disposition.

It is possible that some of the solvent waste transported offsite may be reused. The manufacturing process generates "in process" solvents that are reused onsite only for that particular process so as not to cross contaminate another process. Eventually the solvent is wasted, but even then it may be that it can be utilized by another facility. The DEP Pollution Prevention section may be off assistance in this area.

Reviewed 1998 manifests indicate that the facility generates app. 18,000 lbs. of hazardous waste per. month. All manifests were executed properly.

No other violations were observed during this inspection.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Copy mailed to facility Date 4/6/99Inspector (signature) [Signature] Date 4/6/99



Pennsylvania Department of Environmental Protection
Lee Park, Suite 6010

555 North Lane
Conshohocken, PA 19428

April 6, 1999

Southeast Regional Office

610-832-6212
Fax 610-832-6143

NOTICE OF VIOLATION

Mr. David Potter, P.E.
Norquay Technonogy Inc.
P.O. Box 468
Chester, PA 19016

Re: Follow up Inspection
March 29, 1999
PAD982363889
Chester City
Delaware County

Dear Mr. Potter:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 260 through 270 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

Hazardous waste containers located in the facility warehouse were not provided the aisle space which insures access for purposes of inspection, containment and remedial action with emergency vehicles, contrary to §262.34(c), Reference §265.178(e)(3).

The facility Emergency Response Plan (PPC Plan) remains incomplete, in violation of § 262.46(e).

Containers staged outside of the facility building were unlabeled, in violation of § 262.34 Reference § 265.173(c).

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations. The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program

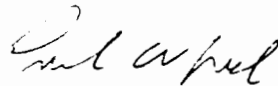
indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Protection, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Protection.

If you have any questions concerning this matter, please feel free to contact me at 610-832-6175.

Sincerely,


Paul A. Jardel
Waste Management Specialist
Waste Management Program

cc: Compliance
James Grabusky
Regional File
US EPA
Re 30 (LK99)91-6



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 11/3/98
Time Start 09:00
Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT
☒ **GENERATOR** ☐ **S Q GENERATOR**

Company name Norquay Technology Inc. I.D. Number PAD9B2363887
Site Address Riverbridge Industrial Center, Front + 110th STS, Chester PA
County Delaware Municipality Chester City ZIP 19016
Name of Inspector Paul Jarabek
Name & Title of Responsible Official Mr. Shawn Shannon -
Person Interviewed Mr. Norman Ellerton Telephone (____) _____
Mailing Address (if different from above) _____
Amount of Hazardous Waste Generated per Month: _____ Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____
PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____
Generator Treatment ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name Fisher Industrial Services License Number AL09B1000894
ST Joseph Motor Lines License Number AH-0390
Transporter Name Ashland Chemical Co. License Number AH-0121
Transporter Name Dart Trucking Co. Inc. License Number AH-0219
Transporter Name Safety Klean License Number AH-0172

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
0001, F003	waste Flammable Liq. MS. ETOH, isopropanol	Ashland Chemical Co. Binghamton NY.
0001	organic waste solids	Engle Inc. Eldersburg, AR.
0001, F003	waste solvents, Toluene, N-Pyridine	Safety Klean Corp. Linden NJ.
0001-18 F003-5	waste Flammable Liq. MS/solids, organic	Fisher Industrial Service Glenwood AL.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name Worley Technology ID Number PA0962363889 Date 11/3/98

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1 2 3 4

REQUIREMENT**CHAPTER CIT.****LINE**

				CONTAINERS (Subchapter I)		
			X	Containers managed in compliance with Chapter 265 Subchapter I	262.34	H025
X				Containers of hazardous waste in good condition	265.171	H026
X				Containers and stored waste compatible	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265.173	H028
X				Containers managed to prevent leaks	265.173(b)	H029
	X			Containers labeled to accurately identify contents <i>See comments</i>	265.173(c)	H030
		X		Container storage areas inspected at least weekly <i>not checked</i>	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265.176, 265.177	H032
X				Proper containment and collection systems in place	265.178(a)-(d)	H033
		X		All storage requirements for ignitable or reactive wastes and nonignitable or nonreactive wastes met	265.178(e)	H034
	X			Containers clearly marked with accumulation date and visible for inspection	262.34(a)(2)	H035
						H036
						H037
						H038
				TANKS (Subchapter J)		
				Tanks labeled "Hazardous Waste"	262.34(a)(4)	H039
				Written certification by registered professional engineer for proper tank (system) design and installation on file	265.192	H040
				Secondary containment provided for tanks (systems) as required	265.193	H041
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265.194	H042
				Tanks labeled to accurately identify contents	265.194(d)	H043
				Required inspections completed and documented in operating log	265.195	H044
				Release reported to Department within 24 hours, unless exempted	265.196	H045
				Special requirements for ignitable and reactive wastes followed	265.198	H046
				SQ Generator complies with 265.201	262.34(e)(3)	H047

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name Norquay Technology ID Number PA0962365809 Date 11/3/98
1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS**1 2 3 4****REQUIREMENT****CHAPTER CIT.****LINE**

				Containment Buildings (Subchapter T)		
				Building completely enclosed to prevent exposure to the elements	265.521(a)(1)	H048
				Meets special requirements if liquids present	265.521(b)	H049
				Primary barrier free of significant gaps, cracks and deterioration	265.521(d)(1)(i)	H050
				Level of hazardous waste within unit is below containment walls	265.521(d)(1)(ii)	H051
				Tracking of waste out of unit by equipment or personnel prevented	265.521(d)(1)(iii)	H052
				No visible dust emissions at doors, windows, vents, etc.	265.521(d)(1)(iv)	H053
				Professional engineer's certification placed in operating record	265.521(d)(2)	H054
				Required inspections performed and logged in operating record	265.521	H055
						H056
						H057
						H058
						H059
				Drip Pads (Subchapter S)		
				Engineer's certification of existing drip pads on file	265.501	H060
				Drip pad meets 265.503 design & operating standards	265.501	H061
				(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265.501(a)	H062
				(b) Has synthetic liner below the pad with properly constructed leak detection system	265.501(b)	H063
				Drip pads & collection system maintained to prevent deterioration	265.503(c)	H064
				Drip pads & collection systems designed to prevent run off	265.503(d)	H065
				Run-on/run-off control system maintained unless pad protected by a structure	265.503(e)	H066
				Release reporting requirements met	265.503(m)	H067
				Drip pads inspected weekly and after storms when in operation	265.504(b)	H068
						H069
						H070
						H071
						H072
						H073

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 11/3/98 ID Number PAD982363889Company/Facility/Site Name Norquay Technology Inc.

This routine hazardous waste large quantity generator inspection of the above facility was done by Department Solid Waste Specialist Paul Jardel along with Mr. Vaughn Ellerton, Norquay Vice President. During this inspection the following was observed:

Mr. Ellerton stated that the facility has increased production capacity due to the installation of new reaction vessels of 1,000 and 1,500 gallons.

Empty drums are staged outside of the facility in an area next to the neighboring PQ Corp. Mr. Ellerton stated that empty drums are overturned on an elevated containment pallet that has four wash nozzles. Rinsate, collected by the pallet, is carried by a pipe to a stainless tote tank. This is piped to the stripping unit. All cleaned drums are then scrapped.

As observed during previous inspections, the waste water tank which collects discharges to the sanitary sewer does pH neutralization prior to release to the POTW

A properly labeled drum of hazardous waste vacuum pump oil, presently stored inside of a large plastic pan, may now be covered under the satellite accumulation area provisions of 262.34(c). This is due to a recent regulatory change.

The production room portable secondary containment pallet held three drums of properly labeled D001-18, F003-5 hazardous waste. The floor, previously coated, shows spalling on the floor, likely from exposure to process waste waters of varying pHs. It is unknown if the waste water sump, constructed of concrete, has deteriorated from the same exposure.

The main hazardous waste storage area, located at the rear of the warehouse, near the loading dock, consisted of app. 40 drums staged on portable containment pallets. The pallets formed a rectangular block that was blocked in on three sides by pallets of chemicals. **This condition is in violation of 265.178(e)(3).** A few of the containers were unlabeled. Mr. Ellerton stated that one of the containers was of a material that had begun leaking, so it had been placed on a containment pallet. The contents of the other drums were not determined.

The facility Emergency Response Plan, that serves as the PPC Plan, was observed to be inadequate in violation of 262.46. A copy of the PPC Plan Guidelines will be forwarded to the facility. Facility Engineer, Mr. David Potter, P.E., stated that he is presently in the process of revising the plan.

Reviewed 1998 manifests indicate that the facility generates app. 18,000 lbs. of hazardous waste per. month. All manifests were executed properly.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____ Copy mailed to facility _____ Date 11/23/98Inspector (signature) Paul Jardel on next page Date _____

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 11/3/98 ID Number PAD982363889Company/Facility/Site Name Norquay Technology Inc.

Personnel training, including RCRA communications training was being given to two new employees during this inspection.

Mr. Ellerton stated that the facility has disposed of much of the "in process" recoverable solvents. One of the solvent mixtures was determined to have formed a quaternary compound that is difficult to crack.

The "in process" solvents are described as being utilized during specific processes, and contaminated with a small amount of associated material from that process. The solvents are able to be reused a number of times prior to redistillation or disposal, but only normally with for that one or another similar process.

No other violations were observed during this inspection.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) *Paula J. [illegible]* Copy mailed to facility Date 11/23/98
Inspector (signature) *Paula J. [illegible]* Date 11/13/98



Pennsylvania Department of Environmental Protection

Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428
November 6, 1998

Southeast Regional Office

610-832-6212
Fax 610-832-6143

NOTICE OF VIOLATION

Mr. Shawn Shannon
Norquay Technonogy, Inc.
P.O. Box 468
Chester, PA 19016

Re: Hazardous Waste Inspection
November 3, 1998
PAD982363889
Chester City
Delaware County

Dear Mr. Shannon:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 260 through 270 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

Hazardous waste containers located in the facility warehouse were not provided. The aisle space which insures access for purposes of inspection, containment and remedial action with emergency vehicles, contrary to required by § 262.34(c), Reference § 265.178(e)(3).

The facility Emergency Response Plan (PPC Plan) is inadequate and should be revised in accordance with § 262.46(e).

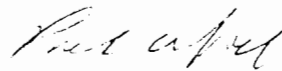
You are hereby notified of both the existence of these violations, as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations. The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising, prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Protection, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Protection.

If you have any questions concerning this matter, please feel free to contact me at 610-832-6175.

Sincerely,



Paul A. Jardel
Waste Management Specialist
Waste Management Program

cc: Compliance
Mr. Grabusky
Regional File
U.S. EPA
Re 30 (SMC98)302-2

Hazardous Waste Inspection Report Land Disposal Restriction Supplemental Checklist

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Citation
1	2	3	4			40 CFR Part 268
				Generators		
X				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
X				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
X				Dilution not used as a substitute for treatment.		3
X				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.		7(a)(5), (a)(6)
	1			Storage Facilities		
				Facility verifies generators classification of waste in accordance with waste analysis plan.		25 Pa Code 265.13(c)
				Containers marked to identify contents and accumulation date.		50(a)(2)
				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
				Facility maintains records of documents produced pursuant to LDR requirements.		7(a)(6)
				Treatment Facilities, Including PBR and RRR Facilities		
				Dilution not used as a substitute for treatment.		3
				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.		7(b)
				Certification and/or notification sent with shipments of waste.		7(b)(4), (b)(5), (b)(6)
				Land Disposal Facilities		
				Facility tests wastes received to assure compliance with applicable treatment standards.		7(c)(2)
				Facility land disposes of restricted waste only if it meets applicable treatment standard.		40
				Facility retains copies of generator notifications and certifications.		7(c)(1)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 2/23/96 Time start 12:30 Time finish _____
Name of Inspector Paul Tarabek
Company, installation name Norquay Technology Inc.
Location Riverbridge Industrial Park, Front + 16yd Sts. Chester PA 19013
County Delaware Municipality Chester City
Identification number PA0982363889
Name of responsible official Norman Elarton
Title Vice President
Mailing Address _____
Area code and telephone number (610) 874-4230
Name of person interviewed Shawn Shannon
Title Env. compliance
Mailing address (if different from above) _____
Area code and telephone number _____

1. Current waste handling method:

- | | | | | |
|---|-------------------------------------|-----------------------------------|--|---|
| a. <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. <input checked="" type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input checked="" type="checkbox"/> reclaim |
| c. <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input checked="" type="checkbox"/> disposal | |
| d. <input type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. 71000 (~3K) kg./mo.
b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
(0001, 2, 18, 20, 35)	Ashland Chemical Co.	Binghamton NY
36 / 0003, 4, 5	Marine Shale Processors Inc	Morgan City La.
	Evergreen Env./ADA Republic Env	Bedford OH.
	Safety Klean Corp.	Linden NJ.
0006, 8	Safety Klean Corp	West Chester PA.

4. Source Reduction: ☐ accomplished, ☒ proposed, ☐ not proposed

(a generic one to encompass the hundreds
of possible waste streams produced.)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name Norquay Technology ID Number PA0982363889 Date 2/23/96

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
<input checked="" type="checkbox"/>				Hazardous waste determination, performed on all waste streams	262.11	H001
<input checked="" type="checkbox"/>				Identification number	262.12	H002
<input checked="" type="checkbox"/>				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
<input checked="" type="checkbox"/>				Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
<input checked="" type="checkbox"/>				PA manifest used for intrastate shipments	262.20(b)	H005
<input checked="" type="checkbox"/>				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
<input checked="" type="checkbox"/>				Manifests filled out properly and completely <u>FS-86</u>	262.20(g)	H007
<input checked="" type="checkbox"/>				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
<input checked="" type="checkbox"/>				Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
<input checked="" type="checkbox"/>				Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
		<input checked="" type="checkbox"/>		Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
		<input checked="" type="checkbox"/>		Placards offered to transporter	262.33	H012
<input checked="" type="checkbox"/>				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
<input checked="" type="checkbox"/>				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
<input checked="" type="checkbox"/>				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
<input checked="" type="checkbox"/>				a). All containers of haz. waste in good condition	265.171	H016
<input checked="" type="checkbox"/>				b). Containers compatible with hazardous waste being stored within	265.172	H017
<input checked="" type="checkbox"/>				c). Containers of hazardous waste kept closed	265.173(a)	H018
<input checked="" type="checkbox"/>				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
<input checked="" type="checkbox"/>				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
<input checked="" type="checkbox"/>				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
		<input checked="" type="checkbox"/>		g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
<input checked="" type="checkbox"/>				h). Proper containment and collection system(s)	265.178	H023
<input checked="" type="checkbox"/>				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
<input checked="" type="checkbox"/>				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

Hazardous Waste Inspection Report

Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
<input checked="" type="checkbox"/>				Records retained at designated location for 20 years	262.40(a)	H026
<input checked="" type="checkbox"/>				Quarterly reports submitted to the Department	262.41(a)	H027
<input checked="" type="checkbox"/>				Exception reporting procedures followed	262.42	H028
	<input checked="" type="checkbox"/>			Hazardous waste disposal plan, if required	262.45	H029
<input checked="" type="checkbox"/>				Spill reporting procedures followed	262.46(a)	H030
<input checked="" type="checkbox"/>				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
	<input checked="" type="checkbox"/>			Special requirements followed for international shipments	262.50, .53, .55, .60	H032
<input checked="" type="checkbox"/>				Source reduction strategy prepared and available	262.80	H033

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 2/23/96 Identification Number PAD982363889
Company/Facility/Site Name Norquay Technology Inc.

This routine hazardous waste large quantity generator inspection of the above facility was done by Department Solid Waste Specialist Paul Jardel along with Mr. Shawn Shannon of Norquay.

During this inspection the following was observed:

All containers of hazardous waste staged in the production room had secondary containment and were properly labeled. Hazardous waste containers staged in the warehouse area are also inside of secondary containment and are properly labeled. Except for hazardous waste oil which is stored inside of a large plastic pan, all hazardous waste is staged on portable pallet sized containment units. There were 25 drums of haz waste stored in the warehouse area during this inspection.

The container of hazardous waste oil should be properly identified.

12 lab sized chemical bottles were staged in the warehouse area, outside of any containment. Mr. Shannon stated that the chemicals may be there pending disposal. Any hazardous wastes should be placed into secondary containment, and segregated from other incompatible wastes. The chemicals included the following: At least three bottles of Methanesulfonic Acid, one bottle of Copper (II) Chloride Dihydrate, and at least three bottles of 4-Dimethylaminopyridine.

Appx. 2/3 of the hazardous waste generated at this facility is transported to Ashland Chemical Co.

The waste water tank which discharges to the sanitary sewer now has a pH monitor which controls HCl and NaOH neutralization prior to release to the POTW

The production room sump which is pumped to the above tank collects liquid wastes with varying pHs. The sump, constructed of concrete, has deteriorated over the years.

The production room floor, which had been previously coated, has returned to its previous condition.

The pre-recovery "in process" solvent may not be a waste as had been described during previous inspections. Mr. Shannon described the materials as solvents utilized during specific processes, and contaminated with a small amount of associated material from that process. The solvents are able to be reused a number of times prior to redistillation or disposal, but only with for that one process. Since the facility manufactures a large number of specialty products (over 100) there are a large number of containers in warehouse storage.

Personnel training, undertaken monthly, is provided to all employees. The standards of 265. 16 should be adhered to.

According to Mr. Shannon the two below grade ASTs are still in the same condition as before.

No violations were observed during this inspection.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Copy mailed to facility Date 2/26/96
Inspector (signature) Paul J. Jardel Date 2/26/96

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 1/26/95 Time start _____ Time finish _____
Name of Inspector Paul Jurdak
Company, installation name Norquay Technology Inc.
Location Riverside Industrial Front + 11th Sts., Chester PA 19026
County Delaware Municipality Chester City
Identification number PAC 982363889
Name of responsible official Norman Elletton
Title Vice President
Mailing Address SAR
Area code and telephone number (610) 874-4330
Name of person interviewed Shawn Shannon
Title Env. Compliance
Mailing address (if different from above) _____
Area code and telephone number _____

1. Current waste handling method:

- a. ☒ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim 266.70
c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. 71000 (~3K) kg/mo.
b. _____ kg/yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>Doc 1, 2, 18, 28, 35, 36</u>		
<u>Foo 3, 4, 5</u>		

4. Source Reduction: ☐ accomplished, ☒ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART B

Site Name Norgum Technology ID Number PA 982 363889 Date 1/26/95

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
X				Hazardous waste determination, performed on all waste streams	262.11
X				Identification number	262.12
X				Hazardous waste shipments offered only to licensed transporters	262.12(d)
X				Authorization received from TSD facility for wastes shipped off-site within PA	262.13
X				PA manifest used for intrastate shipments	262.20(b)
X				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)
		X		Manifests filled out properly and completely	262.20(g)
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)
X				Proper U.S. DOT shipping containers or packages being used	262.30(1)
X				Shipping containers marked and labeled according to U.S. DOT	262.30(2)
X				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)
		X		Placards offered to transporter	262.33
		X		Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)
X				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)
		X		Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)
X				a). All containers of haz. waste in good condition	265.171
X				b). Containers compatible with hazardous waste being stored within	265.172
X				c). Containers of hazardous waste kept closed	265.173(a)
X				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)
X				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)
X				f). Haz. waste accumulation areas inspected at least weekly	265.174
X				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177
X				h). Proper containment and collection system(s)	265.178
X				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)
X				On the job or classroom personnel training program as per 265.16	262.34(a)(5)

Hazardous Waste Inspection Report

Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
<input checked="" type="checkbox"/>				Records retained at designated location for 20 years	262.40(a)
<input checked="" type="checkbox"/>				Quarterly reports submitted to the Department	262.41(a)
<input checked="" type="checkbox"/>				Exception reporting procedures followed	262.42
	<input checked="" type="checkbox"/>			Hazardous waste disposal plan, if required	262.45
		<input checked="" type="checkbox"/>		Spill reporting procedures followed	262.46(a)
		<input checked="" type="checkbox"/>		Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265 (PBR???)	262.46(e)
	<input checked="" type="checkbox"/>			Special requirements followed for international shipments	262.50, .53, .55, .60
<input checked="" type="checkbox"/>				Source reduction strategy prepared and available by January 7, 1994	262.80

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law but is required by State law.	
3. Generator's Name and Mailing Address		Norquay Technologies Riverbridge Industrial Park 800 West Front Street Chester, PA 19103		A. State Manifest Document Number		PAE 0516681		B. State Gen. ID	
4. Generator's Phone (215) 374-4330		5. Transporter 1 Company Name		6. US EPA ID Number		C. State Trans. ID		PA- 1A H040009	
J.B. Hunt Special Commodities		A R D 9 8 1 9 0 3 5 5 1		7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone (501) 820-0000	
9. Designated Facility Name and Site Address		10. US EPA ID Number		E. State Trans. ID		PA-		F. Transporter's Phone ()	
ENSCO Environmental Services of Georgia, Inc. 1015 New South Harris Street Dalton, GA 30720		G A D 0 0 0 2 2 2 0 3 3		G. State Facility's ID		SAME		H. Facility's Phone (706) 226-6477	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. Rq. Waste Flammable Solids, n.o.s., (Toluene, Xylene) 4.1, UN1325, PG II, (D001, F003, F005) (ERG #32)		08 DM		1200 P		P		D001, F003, F005	
b. Rq. Waste Flammable Liquids, n.o.s., (Hexane, Acetone) 3, UN1993, PG II, (D001) (ERG #27)		29 DM		1160 P		P		D001	
c. Rq. Waste Flammable Solids, n.o.s., (Hexane, Acetone) 4.1, UN1325, PG II, (D001) (ERG #32)		03 DM		750 P		P		D001	
d. Rq. Waste Flammable Liquids, n.o.s., (Toluene, Acetone) 3, UN1993, PG II, (D001, F003, F005, D010) (ERG #27)		09 DM		3375 P		P		D001, D018, F003, F005	
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above							
Lab Pack	Physical State	Lab Pack	Physical State	a.	c.	b.	d.		
a. <input type="checkbox"/>	S WMS #285990	c. <input type="checkbox"/>	S WMS #285995						
b. <input type="checkbox"/>	L WMS #285994	d. <input type="checkbox"/>	L WMS #288997						
15. Special Handling Instructions and Additional Information									
Load #84411									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.									
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name		Signature		MONTH DAY YEAR					
Christopher A. Heldt		[Signature]		107127199					
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		MONTH DAY YEAR					
RALPH Webb		[Signature]		107127199					
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		MONTH DAY YEAR					
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name		Signature		MONTH DAY YEAR					



OFFICIAL PENNSYLVANIA MANIFEST FORM

ER-WM-51 REV. 1/91

In case of an emergency or spill immediately call the National Response Center (800) 424-8802 and the PA DEK (717) 787-4343

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law but is required by State law.
3. Generator's Name and Mailing Address Norquay Technologies Riverbridge Industrial Park 215 874-4330 800 West Front Street Chester, PA 19103		1PA D 9 8 2 3 6 3 8 8 9 1		A. State Manifest Document Number PAC 7590170	
4. Generator's Phone ()		6. US EPA ID Number		B. State Gen. ID	
5. Transporter 1 Company Name J.B. Hunt Special Commodities		7. Transporter 2 Company Name		C. State Trans. ID PA- 1A H10140001	
9. Designated Facility Name and Site Address ENSCO Environmental Services of GA, Inc. 1015 New South Harris Street Dalton, GA 30720		10. US EPA ID Number 1B A D 0 0 0 2 2 2 0 8 3		D. Transporter's Phone (501) 820-0000	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	
a. RQ, Waste Flammable Solids, N.O.S. (Hexane, Acetone) 4.1, UN1325, PG II		No. Type		14. Unit Wt/Vol	
		21 DM		8400 P	
b. RQ, Waste Flammable Liquids, Corrosive, N.O.S. (Toluene, ammonium Hydroxide), 3, UN2924, PG II		02 DM		750 P	
c.					
d.					
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above			
Lab Pack Physical State		Lab Pack Physical State			
a. <input type="checkbox"/> 285990		c. <input type="checkbox"/>			
b. <input type="checkbox"/> 414641		d. <input type="checkbox"/>			
15. Special Handling Instructions and Additional Information Load 84411					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name Chris Topher Helget		Signature [Signature]		MONTH DAY YEAR 10 7 27 19 94	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		MONTH DAY YEAR	
Printed/Typed Name		Signature		MONTH DAY YEAR	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		MONTH DAY YEAR	
Printed/Typed Name		Signature		MONTH DAY YEAR	
19. Discrepancy Indication Space Line 18 b (manifest PAC 0516681) mat'l profiled as liquid, received as solid. Line 11a (manifest PAC 7590170) added as indicated in Section 11a, 12, 13, 14 and 1. 8/22/94. 21:04. A. Scott. Line 21 b (manifest PAC 0516681) mat'l profiled as non-corrosive, mat'l (8 of 10 drums) received WPH. 2:13. Line 11 b (manifest PAC 7590170) added as indicated in Section 11a, 12, 13, 14 and 1. 8/22/94. 21:04. A. Scott.					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.		Signature		MONTH DAY YEAR	
Printed/Typed Name		Signature		MONTH DAY YEAR	

P. 02/03

FAX NO. 7062267250

ENSCO DALTON TSD

AUG-17-94 WED 18:42

SALES DISCREPANCY FORM

ORDER #: 148115MANIFEST #: PA 516681 DATE RECEIVED: 8-10-94GENERATOR: Norquay TechSALES REGION: NERLOAD #: 24411CSR: Greg Ignaszak

DISCREPANCIES

ACTION REQUIRED

Line 11 b - 285994 - material profiled as
90% Liquid, 21 of 24 drums received
w/ solid and < 3 inches of free liquid

Please provide profile.
Suggestion: 285990
amend manifest

Line 11 d - 285997 - material profiled as
non corrosive, 2 of 10 drums received
w/ pH > 13 (unable to pH w/ meter
off scale).

Please provide profile.
Suggestion: 414641
please verify constituents and
sign profile and Discrepancy form
amend manifest & LDR.

RESPONSE:

ENSCO, LABORATORY:

Annette ScottDATE: 8/17/94

CUSTOMER APPROVAL:

Chris Hellet X

DATE: _____

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 1/26/95 Identification Number PAD982363889Company/Facility/Site Name Norquay Technology Inc.

This follow up inspection of the above facility was done by Department Solid Waste Specialist Paul Jardel along with Mr. Shawn Shannon of Norquay.

During this inspection the following was observed:

All drums of hazardous waste staged in the production room now have secondary containment and a hazardous waste label with an accumulation date. Hazardous waste containers staged in the warehouse area are also inside of secondary containment and are properly labeled.

Notes:

A second discharge sampling has been done DELCORA. Mr. Shannon stated that these results were much lower than the previous sampling. It is requested that a copy of the latest sampling results be forwarded to the Department.

An amended quarterly report has been submitted including manifest #PAC7590170. Due to discrepancies this manifest has been brought to the attention of this inspector by the DER Central Office staff. Mr. Shannon explained that this manifest is a correction of manifest #PAE0516681. The TSD, ENSCO of Dalton GA, contacted Norquay and informed them that some of the waste included on the original manifest was not as it had been profiled. The later manifest was sent to the TSD in order to correct the discrepancy.

It has been determined that the onsite solvent recovery distillation does not meet the definition of a closed loop system. Norquay may operate the recovery process under 266.90 so long as the stated requirements are met. A notification of this activity should be sent to DER Central Office along with a short explanation of the process. A form for this notification will be sent to the facility.

The pre-recovery "in process" solvent is defined as a waste and is subject to the labeling and storage requirements of Chapter 262.

No violations were observed during this inspection.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Copy mailed to facility Date _____Inspector (signature) Paul Jardel Date 1/31/95

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 10/21/94 Time start _____ Time finish _____

Name of Inspector Paul J. Judd

Company, installation name Norquay Technology Inc.

Location Riverbridge Industrial Center Front + Maple STs. Chester PA 19016

County Catawissa Municipality Chester City

Identification number PA0902363889

Name of responsible official Norman Elington

Title Vice President

Mailing Address SRA

Area code and telephone number (215) 874-4330

Name of person interviewed SRA

Title _____

Mailing address (if different from above) _____

Area code and telephone number _____

1. Current waste handling method:

- | | | | | |
|---|-------------------------------------|-----------------------------------|--|---|
| a. <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. <input checked="" type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input checked="" type="checkbox"/> reclaim |
| c. <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input checked="" type="checkbox"/> disposal | |
| d. <input type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. ~ 3000 kg./mo.
- b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
0001, 2, 18, 28, 35, 36	See last inspection - no change	
FX03, 4, 5		

4. Source Reduction: ☐ accomplished, ☐ proposed, ☐ not proposed being compiled

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name Norquay Technology ID Number PAC 782363 E89 Date 10/21/94

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Hazardous waste determination, performed on all waste streams	262.11	H001
X				Identification number	262.12	H002
X				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
X				Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
X				PA manifest used for intrastate shipments	262.20(b)	H005
X				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
X				Manifests filled out properly and completely	262.20(g)	H007
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
X				Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
X				Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
			X	Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
		X		Placards offered to transporter	262.33	H012
X				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
			X	Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
			X	Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
X				a). All containers of haz. waste in good condition	265.171	H016
X				b). Containers compatible with hazardous waste being stored within	265.172	H017
		X		c). Containers of hazardous waste kept closed	265.173(a)	H018
X				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
		X		e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
		X		f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
		X		g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
			X	h). Proper containment and collection system(s)	265.178	H023
		X		Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
X				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

Hazardous Waste Inspection Report

Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Records retained at designated location for 20 years	262.40(a)	H026
		X		Quarterly reports submitted to the Department	262.41(a)	H027
X				Exception reporting procedures followed	262.42	H028
	X			Hazardous waste disposal plan, if required	262.45	H029
		X		Spill reporting procedures followed	262.46(a)	H030
X				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
	X			Special requirements followed for international shipments	262.50, .53, .55, .60	H032
		X		Source reduction strategy prepared and available	262.80	H033

Hazardous Waste Inspection Report
Land Disposal Restriction Supplemental Checklist

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Citation
1	2	3	4			40 CFR Part 268
				Generators		
X				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
X				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
		X		Dilution not used as a substitute for treatment.		3
X				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.		7(a)(5), (a)(6)
				Storage Facilities		
	X			Facility verifies generators classification of waste in accordance with waste analysis plan.		25 Pa Code 265.13(c)
	X			Containers marked to identify contents and accumulation date.		50(a)(2)
	X			Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
	X			Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
	X			Facility maintains records of documents produced pursuant to LDR requirements.		7(a)(6)
				Treatment Facilities, including PBR and HRR Facilities		
		X		Dilution not used as a substitute for treatment.		3
X				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.		7(b)
X				Certification and/or notification sent with shipments of waste.		7(b)(4), (b)(5), (b)(6)
				Land Disposal Facilities		
	X			Facility tests wastes received to assure compliance with applicable treatment standards.		7(c)(2)
	X			Facility land disposes of restricted waste only if it meets applicable treatment standard.		40
	X			Facility retains copies of generator notifications and certifications.		7(c)(1)



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

Post Office Box 2063
Harrisburg, Pennsylvania 17105-2063

January 5, 1993

ATT-41

Bureau of Waste Management

(717) 787-6239

[REDACTED]

This is in response to your November 30, 1992, request for a variance to the hazardous waste container storage area requirements of 25 Pa. Code Section 265.178. Although a variance cannot be granted from the provisions of that section, we believe, based on the type of waste handled at your facility, that the requirements are generally being met. Section 265.178 requires that container storage areas have a containment system capable of collecting and holding spills, leaks, and precipitation. Since the storage area at your facility is indoors, there will be no precipitation. Furthermore, since the waste handled at your facility is in a dry, chopped/granulated form, the concrete floor of the storage area is capable of collecting and holding any spills or leaks.

In conclusion, as long as the wastes managed at your facility are in a dry form, no modifications will need to be made to the existing storage area in order to conform to the requirements of 25 Pa. Code Section 265.178. We have discussed this matter with Charles Rogers of our Northeast Regional Office who concurs with this interpretation. If you have any additional questions or concerns, please feel free to contact Dwayne Womer of my staff at (717) 787-7381.

Sincerely,

Leon L. Kuchinski

Leon L. Kuchinski, Chief
Division of Hazardous Waste Management

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 10/21/94 Identification Number PAD982363889Company/Facility/Site Name Norquay Technology Inc.

This follow up inspection of the above facility was done by Department Solid Waste Specialist Paul Jardel with permission of Norman Ellerton, Vice President of Norquay.

During this inspection the following violations were observed:

Three unlabeled 55 gal. drums of hazardous waste were observed in the production room. This is a violation of 262.34(a)(2).

Near the portable hazardous waste containment pallets in the warehouse storage area, 27 drums of both liquid and solid hazardous waste were observed to be outside of containment. This is a violation of 262.34 (a)(3) ref. 265.178 (a)(1). The enclosed policy guideline (att. #1) would allow the facility to store the hazardous waste spent filters off of the portable containment units.

Notes:

The DELCORA discharge sampling results have been forwarded to the facility by this inspector. They have not yet been contacted by that POTW regarding a possible permit for the elevated toluene discharge.

The two ASTs located in a previously flooded basement area have been investigated. These tanks were previously noted during a JACA site investigation for the county. The "tank room" floor was flooded to a depth of app. 1 foot. I was able to gain the top of the tanks and observed that one of them was empty. The other tank was entirely full of a black creosote smelling viscous liquid. The facility escorts stated that Norquay had never used the tanks, nor did they use any creosote material.

Stoppers or closures should be present on all hazardous waste containers in accordance with 265.173 (a).

Manifest #PAC7590170 does not appear on the facility quarterly report. If this manifest was not voided in some way an updated quarterly report should be submitted to the Department.

The container storage requirements of 265.178 (e)(1) should be followed. It should be noted that 55 gal. drums are only allowed to be stacked 2 high.

During this facility inspection a hazardous waste transporter arrived onsite. Waste from this facility was to be transported on manifest #PAE0516106. A routine hazardous waste transporter inspection was done on Dart Trucking Co. Inc. (PA-AH0219) at this time.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Copy mailed to facility Date _____Inspector (signature) Continued on next page Date 10/26/94

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 10/21/94 Identification Number PAD982363889

Company/Facility/Site Name Norquay Technology Inc.

The onsite solvent recovery by distillation may meet the of definition of a closed loop system. This will be investigated further during the next inspection.

No other violations were observed during this inspection.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Copy mailed to facility Date

Inspector (signature) *Paul A. Paul* Date 10/26/94



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

Lee Park Suite 8010
555 North Lane
Conshohocken, PA 19428
October 25, 1994

(610) 832-6212

Southeast Regional Office

Mr. Vaughan Ellerton
Norquay Technology Inc.
Riverbridge Industrial Center
P.O. Box 468
Chester, PA 19016

Re: Hazardous Waste Inspection
PAD982363889, 10/21/94
City of Chester
Delaware County

NOTICE OF VIOLATION

Dear Mr. Ellerton:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 260 through 270 of the Rules and Regulations of the Department. Violation of applicable sections of these regulations found during our inspection are as follows:

§262.34(a)(3) A generator may accumulate Hazardous waste onsite without a permit for 90 days or less if containers are managed in accordance with chapter 265 subchapter I (relating to use and management of containers), which states:

§265.178(a)(1) Container storage areas shall have a containment system capable of collecting and holding spills, leaks and precipitation. The containment system shall have an impervious base underlying the containers which is free of cracks or gaps to contain leaks, spills and accumulated rainfall. All joints in an impervious base shall be sealed with appropriate sealants, and (2) Provide efficient drainage from the base to a sump or collection system.

(27) 55 gallon drums containing hazardous waste were without the required secondary containment.

§262.34(a)(2) A generator may accumulate hazardous waste onsite without a permit for 90 days or less if the waste is placed in containers which meet United States Department of Transportation packaging, marking and labeling requirements in 262.30 and 262.33 (relating to packing, labeling and marking; and placarding), which states:

October 25, 1994

§262.30(3) Before transporting or offering a shipment of hazardous waste for transportation offsite, a generator shall permanently mark each container of 110 gallons or less of hazardous waste according to United States Department of Transportation requirements under 40 CFR 172.304 (relating to marking)

Three containers of hazardous waste in the production room were observed to be without the approved labeling

You are hereby notified of both the existence of this violation as well as the need to provide for its prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for the abatement of this violation.

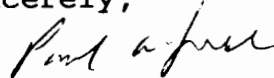
The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to contact me at 610-832-6175.

Sincerely,



Paul A. Jardel
Solid Waste Specialist
Waste Management Program

cc: Central Office
Compliance
Field File
Regional File
U.S. EPA



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

Lee Park Suite 8010
555 North Lane
Conshohocken, PA 19428
February 15, 1994

(610) 832-6212

Southeast Regional Office

Mr. Vaughan Ellerton
Norquay Technology Inc.
Riverbridge Industrial Center
P.O. Box 468
Chester, PA 19013

Re: Hazardous Waste Inspection
PAD982363889, 2/4/94
City of Chester
Delaware County

NOTICE OF VIOLATION

Dear Mr. Ellerton:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 260 through 270 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

§261.41(7) A person or municipality who modifies hazardous waste identification characteristics, ceases production of hazardous waste, changes his status from a small quantity generator to a large quantity generator or vice-versa, or whose waste is removed from a listing in this chapter shall file a notification form with the Department.

The facility should resubmit a Notification of Hazardous Waste Activity form (8700-12), to EPA Region III. Referencing the present PAD#, the facility should reclassify as a large quantity generator and should notify with regard to the onsite recovery of spent solvents. The facility should send a copy of this along with Supplemental Form (ER-WM-53) to DER Bureau Of Waste Management, P.O. 2063, Harrisburg PA 17120.

§262.34(a)(2) A generator may accumulate hazardous waste onsite without a permit for 90 days or less if the waste is placed in containers which meet United States Department of Transportation packaging, marking and labeling requirements in 262.30 and 262.33 (relating to packing, labeling and marking; and placarding), which states:



§262.30(3) Before transporting or offering a shipment of hazardous waste for transportation offsite, a generator shall permanently mark each container of 110 gallons or less of hazardous waste according to United States Department of Transportation requirements under 40 CFR 172.304 (relating to marking)

Three containers of hazardous waste were observed to be missing the approved label. Labels were also missing from containers of spent solvent which are stored in the warehouse prior to onsite recovery.

§262.34(a)(3) A generator may accumulate Hazardous waste onsite without a permit for 90 days or less if containers are managed in accordance with chapter 265 subchapter I (relating to use and management of containers), which states:

§265.178(a)(1) Container storage areas shall have a containment system capable of collecting and holding spills, leaks and precipitation. The containment system shall have an impervious base underlying the containers which is free of cracks or gaps to contain leaks, spills and accumulated rainfall. All joints in an impervious base shall be sealed with appropriate sealants, and (2) Provide efficient drainage from the base to a sump or collection system.

Containers of hazardous waste should have adequate containment. This includes spent solvent stored before onsite recovery.

§262.34(a)(4) A generator may accumulate hazardous waste onsite without a permit for 90 days or less if on each container, each date on which any hazardous waste was placed in that container shall be clearly marked and visible for inspection.

Thirteen 55 gallon drums of hazardous waste were observed to be missing accumulation dates stating when waste had first been placed into the containers.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for the abatement of these violations.

The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

Mr. Ellerton:

-3-

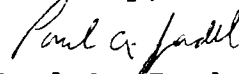
February 15, 1994

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to contact me at 610-832-6175.

Sincerely,



Paul A. Jardel
Solid Waste Specialist
Waste Management Program

cc: Central Office
Compliance
Field File
Regional File
U.S. EPA

**Hazardous Waste Inspection Report
Generators - Part A**

Date of inspection 2/4/94 Time start _____ Time finish _____
 Name of inspector Paul Jardel
 Company, installation name Norquay Technology Inc.
 Location Riverbridge Industrial Center, Front and Lloyd Streets, Chester, Pa. 1901
 County Delaware Municipality City of Chester
 Identification number PA0982363889
 Name of responsible official Vaughan Ellerton
 Title Vice President
 Mailing address _____
 Area code and telephone number (215) 874-4330
 Name of person interviewed SAA
 Title _____
 Mailing address (if different from above) _____
 Area code and telephone number _____

1. Current waste handling method:

- a. ☒ On-site ☐ treatment, ☒ storage, ☐ disposal ☐ PBR
 b. ☒ On-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
 d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. ~ 3000 kg./mo.
 b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number Destination Facility Location and Type

0001-F003-F005	Ashland Chemical Co. Inc.	Binghamton NY. NY 049253719
0001-F003-F005	Safety Klean Corp.	Linden NJ NJ0 002482897

Hazardous Waste Inspection Report
Generators - Part B

1 - No Violation Observed				2 - Not Applicable	3 - Not Determined	4 - Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			262
X				Hazardous waste determination, copies available		.11
X				Identification number		.12(a)
X				Hazardous waste shipments offered only to licensed transporters		.12(d)
X				Authorization received from TSD facility for wastes shipped off-site		.13
X				PA manifest used for intrastate shipments		.20(b)
X				Disposer state manifest or EPA format manifest used for out-of-state shipments		.20(c)
		X		Manifests filled out properly and completely		.20(g), .23(g), b)
		X		Manifests routed properly and within time limits (7 days)		.23(c), d, f, g, 1)
X				Proper U.S. DOT shipping containers or packages		.30(1)
		X		Shipping containers marked and labeled according to U.S. DOT		.30(2)
		X		Containers of 110 gal. or less marked with required PA label		.30(3)
		X		Placards offered to transporter		.33
		X		Wastes accumulated on-site for less than 90 days		.34(1)
		X		Wastes stored in proper containers and properly marked and labeled		.34(2)
		X		Containers managed in accordance with 265.171-.177		.34(3)
		X		Container's clearly marked with accumulation date and visible for inspection		.34(4)
		X		Records retained at designated location for 20 years		.40
		X		Quarterly reports submitted to the Department		.41
		X		Exception reporting procedures followed		.42
	X			Hazardous waste disposal plan, if required		.45
	X			Spill reporting procedures followed		.46(a)
	X			Preparedness, Prevention and Contingency Plan and implemented 265.51-.54		.34(a)(5), .46(e)
	X			Special requirements followed for international shipments		50.53.55.60
	X			On the job or classroom personnel training program 265.16		.34(a)(5)
	X			Drum accumulation area inspected weekly as per 265.174		.34(a)(3)
	X			Manifests legible (all copies)		.23(h)
	X			Tanks managed in accordance with 265.190-.195		.34(a)(2)
	X			Preparedness and Prevention as per 265.31-.37		.34(a)(5)
	X			Emergency Procedures as per 265.55-.56		.34(a)(5)
X				Notification of Hazardous Waste Activity		261.41(f)

Hazardous Waste Inspection Report

Land Disposal Restriction Supplemental Checklist

1-No Violation Observed					2-Not Applicable	3-Not Determined	4-Non-Compliance
Status					REQUIREMENT	Citation	
1	2	3	4	40 CFR Part 268			
					Generators		
X					Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)	
X					Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)	
		X			Dilution not used as a substitute for treatment.	3	
X					Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.	7(a)(5), (a)(6)	
					Storage Facilities		
					Facility verifies generators classification of waste in accordance with waste analysis plan.	25 Pa Code 265.13(c)	
					Containers marked to identify contents and accumulation date.	50(a)(2)	
					Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)	
					Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)	
					Facility maintains records of documents produced pursuant to LDR requirements.	7(a)(6)	
					Treatment Facilities, Including PBR and RRR Facilities		
		X			Dilution not used as a substitute for treatment.	3	
		X			Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.	7(b)	
		X			Certification and/or notification sent with shipments of waste.	7(b)(4), (b)(5), (b)(6)	
					Land Disposal Facilities		
					Facility tests wastes received to assure compliance with applicable treatment standards.	7(c)(2)	
					Facility land disposes of restricted waste only if it meets applicable treatment standard.	40	
					Facility retains copies of generator notifications and certifications.	7(c)(1)	

100

Inspection Report Comments

Date of Inspection 2/4/94 Identification Number PA0982363889Company/Facility/Site Name Norquay Technology Inc.

Inspection of the above Facility was done as a part of The Special Projects Section review of The JACA Phase I assessment of The Riverbridge Industrial Center.

Present for the above inspection were Paul Tardel (SWS), Christian Kuta (Environmental Technician), Walter Payne (Hydro.), and Tom Cannigiani of the Department, and Mr. Vaughan Ellerton, Vice President of Norquay.

The above Facility manufactures a number of chemical intermediates for the pharmaceutical and other industries.

Waste streams consist of spent solvents for the most part and also discarded filters contaminated with solvent, and hazardous waste oil generated thru dryer operations.

During this inspection the following violations were observed: This Facility generates over 1000 kg. of hazardous waste per month and should notify to EPA and DGR as to the change in status. The Facility should also notify regarding the onsite recovery of spent solvents and follow the guidelines of Chapter 266.

The Facility should label containers of hazardous waste as per 262.34(a)(2), 262.30(3), and mark each container with an accumulation start date as per 262.34(a)(4).

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) _____ Date _____

Inspector (signature) Cont'd on next page. Date _____

Page _____ of _____

Inspection Report Comments

Date of Inspection 2/4/94 Identification Number PA0982363889

Company/Facility/Site Name _____

Three containers of hazardous waste were missing the approved label and 13 containers had no accumulation start date.

IT was also noted that all containers of hazardous waste were lacking proper containment required in 262.34(a)(3) Ref. 265.178(a)(1)

Notes: The following have been forwarded to the facility:

Notification of Reg. waste activity. form 8700-12

DER Supplement ERWM-53, Source Reduction Strategy manual
Hazardous waste Regulations, PPC plan guidelines

Quarterly Report form 55-55A.

Due to time restrictions all manifests were not looked over.

Since the facility will now be a large quantity generator, many of the LQG requirements are not in place and will take time to implement.

A sample of waste water was taken at this time. All sumps collect into a waste water tank and are then discharged to DEKORA (POTW). This tank smelled of solvent and the liquid was observed to have at least 2 phases. Analysis requested. were ZHE, semi-volatiles,
no other violations were observed during this inspection

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) copy mailed to facility Date _____Inspector (signature) Paul A. Juchel Date 2/15/94

Page _____ of _____